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2 Attorneys for Defendant
PAYPAL, INC.,

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

7 LENA EVANS, RONI SHEMTOV, and
8 SHBADAN AKYLBEKOV, individually and on
behalf of all others similarly situated.

No. 5:22-cv-00248

**STIPULATION TO EXTEND TIME TO
RESPOND TO COMPLAINT
(L.R. 6-1(a))**

Plaintiffs,
v.

Current Response Date: 02/14/2022
New Response Date: 03/16/2022

Date Action Filed: January 13, 2022

21 PAYPAL, INC., a Delaware corporation; and
DOES 1-25, inclusive.

Defendants.

Pursuant to Rule 6(b)(1) of the Federal Rules of Civil Procedure and Local Rule 6-1(a) of the Northern District of California Civil Local Rules, Plaintiffs Lena Evans, Roni Shemtov, and Shabdan Akylbekov (“Plaintiffs”) and Defendant PayPal, Inc. (“Defendant”), by and through their respective counsel, hereby stipulate as follows:

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WHEREAS, Plaintiffs filed a complaint in the above-entitled action in the United States District Court, Northern District of California on January 13, 2022;

WHEREAS, Defendant was served with a copy of the Summons and Complaint on January 24, 2022;

WHEREAS, Defendant's current deadline to respond to Plaintiffs' Complaint is February 14, 2022; and

WHEREAS, under Civil Local Rule 6-1(a), parties may stipulate in writing, without a court order, to extend the time within which to answer or otherwise respond to a complaint;

WHEREAS, the Parties have conferred and agree that a 30-day extension of time for Defendant to respond to the Complaint is appropriate under the circumstances, as Defendant recently retained counsel in this matter and requires additional time to review the allegations in the Complaint and respond thereto;

WHEREAS, good cause exists for this extension because it will not prejudice any party nor substantially alter the Court's calendar;

NOW THEREFORE, pursuant to Civil Local Rule 6-1(a), the parties hereby stipulate and agree that Defendant's deadline to respond to the Complaint is extended to and including March 16, 2022.

IT IS SO STIPULATED.

Respectfully submitted,

Dated: February 4, 2022

DENTONS US LLP

By: */s/Joel D. Siegel*
Joel D. Siegel

Attorneys for Defendant
PAYPAL, INC.,

1 Dated: February 4, 2022

2 THE BENSAMOCHAN LAW FIRM, INC.
3 SCHREIBER AND SCHREIBER, INC.
4 ERIC BENSAMOCHAN

5 By: /s/Eric Bensamochan

6 Ean Matthew Schreiber
7 Eric Andrew Schreiber
8 Eric Bensamochan

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11
12 Attorneys for Plaintiffs
13 LENA EVANS, RONI SHEMTOV, AND
14 SHBADAN AKYLBEKOV

15 **ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1**

16 In accordance with Civil Local Rule 5-1, I attest that concurrence in the filing of this
17 document has been obtained from the other signatories, which shall serve in lieu of their
18 signatures on the document.

19 Dated: February 4, 2022

20 DENTONS US LLP

21 By: /s/Joel D. Siegel
22 Joel D. Siegel

23 Attorneys for Defendant
24 PAYPAL, INC.,

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28 STIPULATION TO EXTEND TIME TO
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